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*Counsel for Plaintiff and Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

CONAN NADO individually, and as a  
representative of a Class of Participants and  
Beneficiaries of the John Muir Health 403(b)  
Plan,

Plaintiff,

v.

JOHN MUIR HEALTH, and BOARD OF  
DIRECTORS OF JOHN MUIR HEALTH,

Defendants.

Case No: 3:24-cv-01632-AMO

**MOTION FOR ATTORNEYS' FEES AND  
COSTS, ADMINISTRATIVE EXPENSES,  
AND CASE CONTRIBUTION AWARD**

Hearing Date: December 11, 2025

Time: 2:00 PM

Location: Courtroom 10, 19th Floor

Hon. Araceli Martínez-Olguín

Action Filed: March 15, 2024

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on December 11, 2025, at 2:00 p.m., in Courtroom 10, 19<sup>th</sup> Floor of the U.S. Courthouse in San Francisco, California, before Judge Araceli Martínez-Olguín, Plaintiff Conan Nado (“Plaintiff”) will and hereby does move this Court for an Order awarding: (1) attorneys’ fees to Class Counsel in the amount of \$237,500 (25% of the \$950,000 Gross Settlement Amount); (2) reimbursement of \$22,968.88 in litigation costs; (3) \$31,986.00 in settlement administration expenses and \$15,000.00 in independent fiduciary fees; and (3) a case contribution award in the amount of \$5,000 to the named Plaintiff, Mr. Nado.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Sections 7.1 and 7.2 of the Parties’ Class Action Settlement Agreement (Dkt. 47-1) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M. Secunda, the previously filed declaration of the Class Representative (Dkt. 48), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiff has conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose the motion. As of the filing of this motion, there also have been no objections to the proposed attorneys’ fees and costs, settlement administrative expenses, or case contribution award.

Dated this 10th day of October, 2025

**WALCHESKE & LUZI, LLC**

s/ Paul M. Secunda

Paul M. Secunda\*

*\*admitted pro hac vice*

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*Attorneys for Plaintiff and Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2025, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Paul M. Secunda  
Paul M. Secunda